

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Judge Thomas J. Tucker

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**CERTIFICATION OF NO RESPONSE OR OBJECTION  
REGARDING DEBTOR'S FIFTY-SECOND OMNIBUS OBJECTION TO  
CERTAIN CLAIMS**

**(No Valid Basis for any Liability of the City)**

On August 8, 2017, the City Of Detroit ("City") filed its Fifty-Second Omnibus Objection to Certain Claims (No Valid Basis for any Liability of the City) ("52<sup>nd</sup> Omnibus Objection"). [Doc. No. 12625]. The 52<sup>nd</sup> Omnibus Objection was served by the City's claims and noticing agent, Kurtzman Carson Consultants, upon the claimants identified in Exhibit 2 of the 52<sup>nd</sup> Omnibus Objection at the address set forth by each of the claimants on its respective proof of claim, and all other parties who have requested notice pursuant to Bankruptcy Rule 2002. *See Certificate of Service*, Ex. A.

One response to the 52<sup>nd</sup> Omnibus Objection was filed by Richard Hall (“Hall Response”) [Doc. No. 12673]; however, the Hall Response was stricken by the Court [Doc. No. 12681] due to a deficiency within the document.

No other responses to the 52<sup>nd</sup> Omnibus Objection have been filed with the Court and the time to do so has passed. The City respectfully requests that the Court enter an order in substantially the same form as the one attached to the 52<sup>nd</sup> Omnibus Objection. *See Proposed Order*, Ex. B.

Respectfully submitted,

By: /s/ Marc N. Swanson

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Attorneys for the City of Detroit

DATED: September 14, 2017

## **Exhibit A**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

Chapter 9

City of Detroit, Michigan,

Case No. 13-53846

Debtor.

Hon. Thomas J. Tucker

---

**CERTIFICATE OF SERVICE**

I, Andrew Hennen, certify and say that I am employed by Kurtzman Carson Consultants LLC (KCC), the claims and noticing agent for the Debtor in the above-captioned case.

On August 7, 2017, at my direction and under my supervision, employees of KCC caused to be served the following document via Email on the service list attached hereto as **Exhibit A**; and via First Class mail on the service lists attached hereto as **Exhibit B** and **Exhibit C**:

- **Debtor's Fifty-Second Omnibus Objection To Certain Claims (No Valid Basis for any Liability of the City)** [Docket No. 12625]

Dated: August 7, 2017

/s/ Andrew Hennen  
Andrew Hennen  
KCC  
2335 Alaska Ave  
El Segundo, CA 90245

# **EXHIBIT A**

**Exhibit A**  
**Served via Email**

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**Exhibit A**  
**Served via Email**

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**Exhibit A  
Served via Email**

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**Exhibit A**  
**Served via Email**

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**Exhibit A**  
**Served via Email**

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**Exhibit A**  
**Served via Email**

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Counsel for Community Foundation for Southeast Michigan; William Davidson Foundation; The Fred A. and Barbara M. Erb Family Foundation; Max M. and Marjorie S. Fisher Foundation; The Ford Foundation; Hudson-Webber Foundation; W.K. Kellogg Foundation; McGregor Fund; Charles Stewart Mott Foundation; and A. Paul and Carol C. Schaap Foundation (Collectively, the "Foundations")	Plunkett Cooney	Douglas C Bernstein	dbernstein@plunkettcooney.com
Counsel for Waste Management, Inc.	Plunkett Cooney	David A. Lerner & Patrick C Lannen	dlerner@plunkettcooney.com; plannen@plunkettcooney.com
Top 20 Creditor - City's Pension Trusts	Police and Fire Retirement System of the City of Detroit	Attn: Joseph E. Turner, Esq.	jturner@clarkhill.com
Union Representative	Police Officers Association of Michigan	Attn: John Barr	poam@poam.net
Union Representative	Police Officers Labor Council	Attn: Chet Kulesza	ck445polc@yahoo.com
Union Representative	Police Officers Labor Council	Attn: Marvin Hansberry	HansberryM@detroitmi.gov
Union Representative	Police Officers Labor Council	Attn: Jan Zaleski	presidentjan@aol.com
Counsel for CitiMortgage, Inc.	Potestivo & Associates PC	Mary Atallah	matalah@potestivolaw.com
Interested Party	Primeshares World Markets, LLC		jd@primeshares.com; transfer@primeshares.com
Counsel for Michael Beydoun	Raymond Guzall III PC	Raymond Guzall III	rayguzall@attorneyguzall.com
Attorneys for Creditors: Carlton Carter, Bobby Jones, Roderick Holley and Richard T. Weatherly	Resnick & Moss PC	H Nathan Resnick	hnresnick@resnicklaw.net; hnresnick@resnicklaw.com
Retiree Representative	Retired Detroit Police and Fire Fighters Association	Attn: Donald Taylor	rdpffa@hotmail.com

**Exhibit A**  
**Served via Email**

Party Description	Company	Contact	Email
Counsel to Eric Kimbrough, Leinathian Jelks, Brandon Brooks, Phyllis Tharpe, Rodney Heard, Clenette Harris, Gregory Brazell, Jennifer Harris-Barnes, Henry Hassan, Melvin Miller, Terry Hardison, Velma, Denson, Raymond Thompson, Lucy Flowers, Brandon Gilbert, Brady Johnson, Quentin King, Sharon Pettway, Taralyn Smith, Donna Weatherspoon, Tarita Wilburn, Joseph Wright, Laverne Covington, James Matson, Kevin McGillivray, Rhonda Craig, Orlando Marion, John Collins, Terry Hardison, Carolyn Harp, Jeffrey Peterson, Clementine Stephens, Ezekiel Davis, Michael McKay, David Both, Raymond Thompson, Jr., Doug Taylor, Shumithia Baker, Floyd Brunson, Jerry Ashley, Anthony Harmon, Shelton Bell, Jr., Jeremiah Duren, Otis Evans, Wendy Jefferson, Gary Musser, Mario Littlejohn, Angela Davis, Jeffrey Theriot, Bernard White, Eddie Moore, Robert McGowen, Curtis Morris, Hondra Porter, Kevin McDonald, Jay Woods, Taesean Parnell, Yvette Spencer, Viena Lowe, Landon Banks, Darchella Lattner, Micholas Martin, Marily Cloyd, Robert Hall, Victoria Wilson, Theresa Chalch, Angela Davis, Jamie Jackson, Donald Harris, Winter Owens, Samiya Speed, Teran Brown, Antonio Brooks, Jermaine Gleen, Ray	Romano Law PLLC	Attn Daniel G Romano & Trevor J. Zamborsky	dromano@romanolawpllc.com
Counsel for Robbie Flowers, Michael Wells, Janet Whitson, Mary Washington and Bruce Goldman ("Flowers plaintiffs"); and Detroit Police Command Officers Association ("DPCOA"); Detroit Fire Fighters Association, I.A.F.F. Local 344	Sachs Waldman PC	Mami Kato & Mary Ellen Gurewitz	mkato@sachswaldman.com;
Counsel for Official Retiree Committee	Salans FMC SNR Dentons Europe LLP	Claude Montgomery	claudemontgomery@Dentons.com
Contract Counterparty	SBS Financial Products Company, LLC	Attn. John Carter	jcarter@sbsco.com
Counsel for Ambac Assurance Corporation	Schafer and Weiner PLLC	Brendan G Best	bbest@schaferandweiner.com
Counsel for FMS Wertmanagement AöR	Schiff Hardin LLP	Frederick J. Sperling & Paul E. Greenwalt	fsperling@schiffhardin.com; pgreenwalt@schiffhardin.com
Counsel for DEPFA Bank PLC	Schiff Hardin LLP	Rick L Frimmer & Matthew W Ott	mott@schiffhardin.com
Counsel for Schneiderman and Sherman PC; Attorney for U.S. Bank National Association as servicer for Michigan State Housing Development Authority; Flagstar Bank, FSB; Counsel for Kondaur Capital Corporation	Schneiderman & Sherman PC	Neil Sherman	NSherman@sspclegal.com
Union Representative	SEIU Local 517M	Attn: Yolanda Langston	langstony@gmail.com
Union Representative	Senior Accountants, Analysts & Appraisers Association	Attn: Audrey Bellamy	ayoung586@comcast.net
Union Representative	Senior Water Systems Chemist Association	Attn: Andrew Ross	aross@dwsd.org
Counsel for The Kales Grand Circus Park LLC	Seyburn Kahn	David T Lin	dlin@seyburn.com
Fee Examiner	Shaw Fishman Glantz & Towbin LLC	Ira Bodenstein Gordon Gouveia David Doyle and Marc Reiser	ibodenstein@shawfishman.com; ggouveia@shawfishman.com; ddoyle@shawfishman.com
Counsel for Detroit Winsor Tunnell LLC	Sheldon S Toll PLLC	Sheldon S Toll	lawtoll@comcast.net
Counsel for National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn: Jeffrey Bjork, Esq. & Eric D. Tashman, Esq.	etashman@sidley.com; jbjork@sidley.com
Counsel for National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn Guy S Neal	gneal@sidley.com
Counsel for National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn James F Bendoragel	jbendoragel@sidley.com
Counsel for National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn Jeffrey E Bjork	jbjork@sidley.com

**Exhibit A  
Served via Email**

Party Description	Company	Contact	Email
Counsel for Retired Detroit Police and Fire Fighters Association ("RDPFFA"); 2) Donald Taylor, President of RDPFFA; 3) Detroit Retired City Employees Association ("DRCEA"); and 4) Shirley V. Lightsey, President of DRCEA	Silverman & Morris PLLC	Thomas R Morris and Karin F. Avery	morris@silvermanmorris.com; avery@silvermanmorris.com
Counsel for Unisys Corporation	Sirlin Lesser & Benson PC	Dana S Plon	dplon@sirlinlaw.com
Counsel for Airgas USA LLC	Smith Katzenstein & Jenkins LLP	Kathleen M Miller	kmiller@skjlaw.com
State of Michigan Chief Legal Counsel	State of Michigan Chief Legal Counsel	Matthew Schneider	Schneiderm7@michigan.gov
State of Michigan Assistant Attorney General, Counsel to State of Michigan	State of Michigan Revenue & Collections Division	Steven B Flancher & Matther Schneider	flanchers@michigan.gov; schneiderm7@michigan.gov
The Office of the Treasurer for the State of Michigan	State Treasurer		MIStateTreasurer@michigan.gov
Counsel for Gabriel, Roeder, Smith & Company; Clark Associates, Inc.	Stevenson & Bullock PLC	Charles D Bullock Elliot G Crowder Sean M Walsh & Michael A. Stevenson	cbullock@sbplclaw.com; ecrowder@sbplclaw.com
Counsel for the Detroit Police Lieutenants and Sergeants Association	Sudnick Law PC	Peter P Sudnick	psudnick@sudnicklaw.com
Sylvia Jean Brown Jones, Pro Se	Sylvia Jean Brown Jones		bjdelta55@gmail.com
City's Secured & Unsecured Bonds	The Bank of New York Mellon Trust Company, National Association, as trustee	Attn: Eduardo Rodriguez	eduardo.rodriguez@bnymellon.com
Corporation Counsel for the City of Detroit	The City of Detroit	Attn: Corporation Counsel	Johnsoncu@detroitmi.gov
Counsel for Kevin Lewis & Jeremy Morris	The Markowitz Law Office	Carolyn B Markowitz PC	bankruptcy@markowitzlegal.com
Counsel for Michigan Auto Recovery Service Inc; Wayne County Circuit Court, Hyde Park Cooperative, et al. v. City of Detroit, by and through its Buildings and Safety Engineering Department, Case No. 10-005687-CZ	Thornbladh Legal Group PLLC	Kurt Thornbladh	kthornbladh@gmail.com; thornbladh.kurt3@gmail.com
Union Representative	UAW - Local # 412	Attn: John Cunningham	jcunningham@uaw.net
Union Representative	UAW - Local #212	Attn: John Cunningham	jcunningham@uaw.net
Union Representative	UAW – PAA Local #2211	Attn: Robyn Brooks	BrooR@detroitmi.gov
Union Representative	UAW – WWTP Local #2200	Attn: Laurie Stuart	mimilaurie@yahoo.com;
Union Representative	United Auto Workers Union	Attn: Michael Nicholson	mnicholson@nichfeld.com
Counsel for the Police and Fire Retirement System of the City of Detroit (the "PFRS") and the General Retirement System of the City of Detroit (the "GRS")	Clark Hill PLC	Shannon L Deeby	sdeeby@clarkhill.com
Office of the United States Trustee	Office of the United States Trustee	Sean Cowley	Sean.Cowley@usdoj.gov
Attorneys for Defendants Detroit General Retirement System Service Corporation and Detroit Police and Fire Retirement System Service Corporation	Butzel Long, PC	Bruce L Sendek	Sendek@butzel.com
Attorneys for Defendants Detroit General Retirement System Service Corporation and Detroit Police and Fire Retirement System Service Corporation	Butzel Long, PC	Bruce L Sendek	Sendek@butzel.com
Counsel for City of Detroit, Michigan	Togut Segal & Segal LLP	Attention: Albert Togut, Scott E. Ratner & Neil Berger	seratner@teamtogut.com; neilberger@teamtogut.com; dperson@teamtogut.com; adeering@teamtogut.com; dcahir@teamtogut.com
Counsel for the Detroit Public Library	Gold Lange & Majoros PC	Stuart A Gold & Hannah Mufson McCollum	sgold@glmpc.com;
Counsel for Nuveen Asset Management and BlackRock Financial Management, Inc.; and Greenhill & Co LLC	Steinberg Shapiro & Clark	Mark H Shapiro	shapiro@steinbergshapiro.com
State of Michigan, Department of Attorney General	Dickinson Wright PLLC	Steven G Howell and Allison R Bach	showell@dickinsonwright.com; abach@dickinsonwright.com
Counsel for Assured Guaranty Corporation and Assured Guaranty Municipal Corporation	Berkshire Hathaway Assurance Corporation	Attn: Kara Raiguel, Sunil Khanna and Thomas Scherer	skhanna@berkre.com
Counsel for US Health & Life Insurance Company	Gold Lange & Majoros PC	Sandra L Oconnor	soconnor@glmpc.com



**Exhibit A**  
**Served via Email**

Party Description	Company	Contact	Email
Counsel for Erste Europäische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A., Hypothekenbank Frankfurt AG, Hypothekenbank Frankfurt International S.A., and Erste Europäische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A. (collectively "EPPK").	Ballard Spahr LLP	Matthew G Summers	summersm@ballardspahr.com
Top 20 Creditor - City's Secured & Unsecured Bonds (Including Sewer and Water)	U.S. Bank National Association, as trustee, bond registrar transfer agent, paying agent, custodian and/or contract administrator	Attn: Susan E. Jacobsen VP	susan.jacobsen2@usbank.com
Counsel for Syncora Guarantee Inc	Susheel Kirpalani Quinn Emanuel Urquhart & Sullivan, LLP		susheelkirpalani@quinnemanuel.com
Counsel for DEPFA Bank PLC	Schiff Hardin LLP	Suzanne L Wahl	swahl@schiffhardin.com
Union Representative	Utility Workers Union of America Local #531	Attn: Samuel Wilson	swilson@dwsd.org
Counsel for The Bank of New York Mellon	Wolfson Bolton PLLC	Scott A Wolfson & Anthony J Kochis	swolfson@wolfsonbolton.com; akochis@wolfsonbolton.com
Union Representative	Association of Professional & Technical Employees	Attn: Dempsey Addison	theda3t@yahoo.com
Union Representative	Teamsters Local #214	Attn: Joseph Valenti	tl214teams@teamsters214.org
Counsel to Certain Significant Holders of the COPs	Kramer Levin Naftalis & Frankel LLP	Thomas Moers Mayer	tmayer@kramerlevin.com
Counsel for Siemens Industry Inc.	Bowman and Brooke LLP		tom.branigan@bowmanandbrooke.com elizabeth.favaro@bowmanandbrooke.com
Union Representative	Utility Workers Union of America	Attn: James Harrison	jharrison@uwua.net
Counsel for Center for Community Justice and Advocacy ("CCJA")	Vanessa G. Fluker, Esq., PLLC	Vanessa G Fluker	vgflawyer@sbcglobal.net
Interested Party	Vanguardians	Barry Allen	pra@vanguardians.org
Counsel for UBS AG and Merrill Lynch Capital Services Inc (COP Swap Counterparties)	Warner Norcross & Judd LLP	Douglas A Dozeman & Charles N Ash Jr	ddozeman@wnj.com; cash@wnj.com
Counsel for Financial Guaranty Insurance Company	Weil, Gotshal & Manges LLP	Alfredo R Perez	alfredo.perez@weil.com
Counsel for Financial Guaranty Insurance Company	Weil, Gotshal & Manges LLP	Attn: Gary T. Holtzer, Esq. & Alfredo R. Pérez, Esq.	gary.holtzer@weil.com; alfredo.perez@weil.com
Counsel for Financial Guaranty Insurance Company	Weil, Gotshal & Manges LLP	Kelly DiBlasi	kelly.diblas@weil.com
Counsel for Financial Guaranty Insurance Company	Williams Williams Rattner & Plunkett PC	Ernest J Essad Jr	ejessad@wwrplaw.com
Counsel for Assured Guaranty Municipal Corporation	Winston & Strawn LLP	Attn: Lawrence A. Larose Samuel S. Kohn Carrie V. Hardman	chardman@winston.com
Counsel for International Association of Fire Fighters, AFL-CIO, CL	Woodley & McGillivray	Douglas L Steele	dls@wmlaborlaw.com

## **EXHIBIT B**



**Exhibit B**  
**Served via First Class Mail**

Party Description	Company	Contact	Address 1	Address 2	City	State	Zip	Country
Union Representative	AFSCME Council #25	Attn: Albert Garrett	1034 N. Washington		Lansing	MI	48906	
Union Representative	AFSCME Council #25	Attn: Albert Garrett	600 W. Lafayette, Ste. 500		Lansing	MI	48906	
Union Representative	AFSCME Council #25	Attn: Ed McNeil	600 W. Lafayette, Ste. 500		Detroit	MI	48226	
Union Representative	AFSCME Local #0023	Attn: Robert Stokes	600 W. Lafayette, Ste. 134		Detroit	MI	48226	
Union Representative	AFSCME Local #0312	Attn: Phillip Douglas	14022 Linwood		Detroit	MI	48238	
Union Representative	AFSCME Local #0457	Attn: Laurie Walker	600 W. Lafayette, Ste. L – 104		Detroit	MI	48226	
Union Representative	AFSCME Local #1220	Attn: Gerald Thompson	600 W. Lafayette, Ste. 136		Detroit	MI	48226	
Union Representative	AFSCME Local #1227	Attn: Joseph Walter	P.O. Box 36314		Grosse Pointe Farms	MI	48236	
Union Representative	AFSCME Local #1642	Attn: Gina Thompson-Mitchell	600 W. Lafayette, Ste. L – 123		Detroit	MI	48226	
Counsel for Airgas USA LLC	Airgas USA LLC	Mr David Boyle	259 Radnor-Chester Rd Ste 100	PO Box 6675	Radnor	PA	19087-8675	
Union Representative	Association of Professional Construction Inspectors	Attn: Juanita Sanders	2727 Second Ave., Ste. 314B		Detroit	MI	48201	
Counsel for the Police and Fire Retirement System of the City of Detroit and the General Retirement System of the City of Detroit	Clark Hill PLC	Robert D Gordon	151 S Old Woodward Ave Ste 200		Birmingham	MI	48009	
Counsel for Kay Development	David W Yaldo PC	David W. Yaldo	4036 Telegraph Road, Suite 204		Bloomfield Hills	MI	48302	
Retiree Representative	Detroit Firemen's Fund Association	Attn: Kim Fett	1301 Third St. Suite 329		Detroit	MI	48226	
Retiree Representative	Detroit Police Benefit and Protective Association	Attn: Delbert R. Jennings, Sr.	3031 W. Grand Boulevard, Suite 405		Detroit	MI	48202	
Retiree Representative	Detroit Retired City Employees Association	Attn: Shirley V. Lightsey	P.O. Box 40713		Detroit	MI	48240	
Counsel for U.S. Bank National Association (Top 20 Creditor)	Faegre Baker Daniels LLP	Attn: Abby E. Wilkinson, Esq.	2200 Wells Fargo Center	90 South Seventh Street	Minneapolis	MN	55402-3901	
Union Representative	Field Engineers Association	Attn Larry Hart	PO Box 252805		West Bloomfield	MI	48325	
The Office of the Governor of the State of Michigan	Governor Rick Snyder		P.O. Box 30013		Lansing	MI	48909	
Counsel for The Detroit Institute of Arts	Honigman Miller Schwartz and Cohn LLP	T. O'Reilly	600 Woodward Ave	2290 First National Bldg	Detroit	MI	48226	
Counsel for Defendants Greektown Casino and Detroit Entertainment LLC dba Motorcity Casino Hotel	Honigman Miller Schwartz and Cohn LLP	Jennifer Zbytowski Belveal	2290 First National Bldg	660 Woodward Ave	Detroit	MI	48226-3506	
Counsel for HP Enterprise Services LLC	HP Enterprises Services LLC	Ayala Hassell	5400 Legacy Dr		Plano	TX	75024	
Counsel for HP Enterprise Services LLC	HP Enterprises Services LLC	Ken Higman	12610 Park Plz Dr Ste 100		Cerritos	CA	90703	
Interested Party	IBM Corporation	Attn National Bankruptcy Coordinator	275 Viger East Ste 400		Montreal	QC	H2X 3R7	Canada
Counsel for IBM Credit LLC	IBM Credit LLC	Andy Gravina	Special Handling Group MD NC317	6303 Barfield Rd NE	Atlanta	GA	30328	
Counsel for St Martins Cooperative	Law Offices of Lee & Correll	Michael K Lee	24901 Northwestern Hwy Ste 113		Southfield	MI	48075	
Counsel for FK Park, LLC and FK South, LLC	Maddin, Hauser, Roth & Heller, P.C.	Ian S Bolton	28400 Northwestern Hwy 2nd Fl		Southfield	MI	48034	
Counsel for Syncora Guarantee Inc	Mantese Honigman Rossman and Williamson PC	Brendan Frey	1361 E. Big Beaver Road		Troy	MI	48063	
Counsel for US Bank National Association	McDermott Will & Emery LLP	Jeffrey A Rossman	227 W Monroe St		Chicago	IL	60606	
Counsel for Bishop Real Estate, L.L.C.	McDonald Hopkins PLC	Jason L Weiner	39533 Woodward Ave Ste 318		Bloomfield Hills	MI	48304	
Pro se	Nathaniel Brent		538 S Livernois		Detroit	MI	48209	
Office of the United States Trustee	Office of the United States Trustee	Daniel McDermott	211 West Fort Street Suite 700		Detroit	MI	48226	

**Exhibit B**  
**Served via First Class Mail**

Party Description	Company	Contact	Address 1	Address 2	City	State	Zip	Country
Counsel enters an appearance for The Bank of New York Mellon (successor by operation of law to The Bank of New York), as custodian of the Police and Fire Retirement System of the City of Detroit Fund and as custodian of the General Retirement System of the City of Detroit Fund	Reed Smith LLP	Amy M Tonti	225 Fifth Ave		Pittsburgh	PA	15222	
Interested Party	Ricoh USA Inc	Recovery & Bankruptcy Group	3920 Arkwright Rd Ste 400		Macon	GA	31210	
Union Representative	Sanitary, Chemists & Technicians Association	Attn: Saulius Simoliunas	2727 Second Ave. Rm. 314 – D		Detroit	MI	48201	
Counsel for Parsons Brinckerhoff Michigan, Inc.	Schiff Hardin LLP	Andrew M. Minear	666 Fifth Ave	17th Fl	New York	NY	10103	
SEC	Securities & Exchange Commission	Bankruptcy Section	175 W Jackson Blvd	Suite 900	Chicago	IL	60604-2815	
Counsel for National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn: Guy S. Neal, Esq.	1501 K Street, N.W.		Washington	DC	20005	
Counsel for Public Lighting Authority	The Allen Law Group, P.C.	Attn: Ron Liscombe, Esq.	3011 West Grand Boulevard	2500 Fisher Building	Detroit	MI	48202	
The City, c/o the Emergency Manager	The City of Detroit	Attn: Kevyn D. Orr, Emergency Manager	Coleman A. Young Municipal Center	2 Woodward Ave Suite 1126	Detroit	MI	48226	
Counsel for Michigan Council 25 of the American Federation of State, County and Municipal Employees (AFSCME), AFL-CIO	The Sanders Law Firm PC	Herbert A Sander	615 Griswold St Ste 913		Detroit	MI	48226	
Top 20 Creditor - City's Secured & Unsecured Bonds (Including Sewer and Water)	U.S. Bank National Association, as trustee, bond registrar transfer agent, paying agent, custodian and/or contract administrator	Attn: Susan T. Brown	Senior Vice President and Manager	535 Griswold Ste 550	Detroit	MI	48226	
Top 20 Creditor - City's Secured & Unsecured Bonds (Including Sewer and Water Bonds)	U.S. Bank National Association, as trustee, for the Detroit Sewer and Water Bonds	Attn: Lawrence J. Bell	PD-OR-P6TD		Portland	OR	97204	
Counsel for United States of America	Unites States Attorney	Julia A. Caroff, Assitant US Attorney	211 W Fort St Ste 2001		Detroit	MI	48226	
Union Representative	Utility Workers Union of America Local #488	Attn: Carl Anderson	19315 Westmoreland		Detroit	MI	48219	
Union Representative	Utility Workers Union of America Local #504	Attn: Curlisa Jones	5405 Railview Ct. - Apt. 166		Shelby Township	MI	48316	
Counsel for U.S. Bank National Association (Top 20 Creditor)	Waller Lansden Dortch & Davis LLP	Attn: Courtney Rogers	511 Union Street, Suite 2700		Nashville	TN	37219	
Counsel for Assured Guaranty Municipal Corporation	Winston & Strawn LLP	Sarah T. Foss	1111 Louisiana 25th Fl		Houston	TX	77002-5242	

# **EXHIBIT C**

**Exhibit C**  
**Served via First Class Mail**

Company	Contact	Address 1	Address 2	City	State	Zip
Burcicki, Mark	Posner, Gerald F.	Posner Posner and Posner	645 Griswold St Ste 1400	Detroit	MI	48226
Hall, Richard		23077 Greenfield Rd.	Suite 557	Southfield	MI	48075
Mcclure, Timothy D.	c/o Brett A. Asher	Kerr, Russell and Weber, PLC	500 Woodward Ave., Ste. 2500	Detroit	MI	48222
Richard Hall		PO Box 32511		Detroit	MI	48232
Salem A Salamey	Canzano, Roger	Court House Services	2595 Lapeer Rd, Auburn Hills	Auburn Hills	MI	48033
Timothy D. McClure		651 Lenox Avenue		Pontiac	MI	48340

## **Exhibit B**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,  
Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

**ORDER SUSTAINING DEBTOR'S FIFTY-SECOND OMNIBUS  
OBJECTION TO CERTAIN CLAIMS**

**(No Valid Basis for any Liability of the City)**

Upon review of the fifty-second objection to claims (the “Objection”),<sup>1</sup> of the Debtor, City of Detroit, Michigan (the “City”), seeking entry of an order disallowing and expunging each of the claims listed on Exhibit 2 to the Objection; and it appearing that this Court has jurisdiction over the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and Article VII of the Plan; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of this proceeding and the Objection in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that the relief requested in the Objection is in the best interests of the City, and its creditors; and due and proper notice of the Objection having been given as provided in the Objection; and it appearing that no other or further notice of the Objection need be given; and a hearing on the Objection having been held before the Court; and any

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Objection.

objections or other responses to the Objection having been overruled or withdrawn; and the Court finding that the legal and factual bases set forth in the Objection and at the hearing establish just cause for the relief granted; and after due deliberation and good and sufficient cause appearing therefore;

IT IS ORDERED that:

1. The Objection is sustained.
2. Each of the proofs of claim listed on Exhibit 2 annexed to the Objection is hereby disallowed and expunged in its entirety, pursuant to Section 502(b) of the Bankruptcy Code.
3. The City's claims agent is authorized to update the claims register to reflect the relief granted in this Order.
4. The City is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Objection.
5. Each claim and the objections by the City to each claim as addressed in the Objection and set forth on Exhibit 2 constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed and constitute a separate order with respect to each such claim and, to the extent necessary under Bankruptcy Rules 7054 and 9014, constitutes a final judgment with respect to such claim, and the Court expressly determines that there is no just reason for delay of the entry of the final judgment with respect to such claim. Any

stay of this Order shall apply only to the contested matter that involves such creditor and for which such stay has been granted or may be in effect, and shall not act to stay the applicability or finality of this Order with respect to the other contested matters covered hereby, and further provided that the City shall have the right, but not the need, to submit a separate order with respect to contested matters or claims.

6. The City retains all of its rights to object, on the merits or any other basis, to any of the Claims identified on Exhibit 2.

7. Notice of the Objection as provided therein is good and sufficient notice of such objection, and the requirements of Bankruptcy Rule 3007(a) and the local rules of the Court are satisfied by such notice.

8. Nothing in this Order is intended to, shall constitute or shall be deemed to constitute the City's consent, pursuant to section 904 of the Bankruptcy Code, to this Court's interference with (a) any of the political or governmental powers of the City, (b) any of the property or revenues of the City or (c) the City's use or enjoyment of any income-producing property.